

Docket ID No. EPA-HQ-OA-2018-0259

Comments submitted on the Docket Subject titled

Strengthening Transparency in Regulatory Science

Comment on Strengthening Transparency in Regulatory Science, Environmental Protection Agency, 40 CFR Part 30, RIN 2080—AA14 [EPA-HQ-OA-2018-0259; FRL-9977-40-ORD].

Attachment to comments submitted by John Dale Dunn MD JD

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Table of contents of elements of the attachment.

Introductory remarks in support of the proposed US EPA Transparency action that are submitted as comments.

Then in the attachment, the following documents listed as items 1-12.

- 1. Other commentaries I agree with highlighted P 3**
- 2. Choices in Risk Assessment--Report for the DOE 1994 by Steve Milloy p.6**
- 3. Commentary on proposed new, more stringent EPA ambient air standards for 2006. p 12**
- 4. Dunn submission on Ozone October 8, 2007 p 33**
- 5. Dunn Presentation to the Human Health Risk Assessment Subcommittee of the and Executive Committee of the US EPA Board of Scientific Counselors 2007, 2008 p 43**
- 6. Essay by John Dale Dunn for congressional Aides of the Space, Science and Technology Committee of the House, on matter of Science and the Law p. 43**
- 6. An abbreviated story of the effort by John D. Dunn MD JD to expose the misconduct of the US EPA in matters of toxicology and epidemiology. p 58**
- 7. Dunn and Milloy on EPA sponsored Human Experiments using small particles emissions. p47**
- 8. ESSAYS and ARTICLES that discuss US EPA SCIENTIFIC MISCONDUCT p 66**
- 9. 2018 Enstrom reviews and exposes EPA air quality epidemiological misconduct p67**
- 10. Dunn on US EPA Linear No Threshold Misconduct 2018 p 75**
- 11. Dunn on Global Warming and Climate Change EPA misconduct—the scam of making Carbon Dioxide a pollutant. P 78**
- 12. Conclusion p 115**

I will detail in the attachment submitted the nature of the EPA sponsored research fraud, the methods and data manipulation and management that have resulted in EPA fraud on the public about air quality health effects, toxicological claims in other areas of EPA responsibility and the EPA full blown commitment to the hoax of CO2 levels as a cause of catastrophic warming. In these three areas of EPA research and policy

making it is easy to identify the frauds on the public that are supported by a well-paid band of hired researchers and an in house gang of committed environmental true believers. The result is a fraud and research and policy conduct that is so badly informed and poorly researched and developed that it includes systematic commission of civil and even criminal acts to further an EPA agenda of aggressive environmental regulations that have created tremendous economic burdens for no good reason other than a fanatic environmental ideological agenda.

I will elaborate with specific references and documents in the attached document that provides items 1-12 listed above the irresponsible and flagrantly unscientific research funded and promoted by the USEPA on all matters of toxicology and epidemiology and my admonition to any reader is that if we do not stop this junk science for politics and ideology, we will follow the path of fools for a cause—the path of true believers that is paved with confirmation biases and fallacious science and policy making that violates the law and cheats the taxpayer in two ways, scaremongering, and regulatory burdens that steal resources and assets for regulatory compliance that diminishes better use of those resources in the public and private sectors. My promise to the reader is I will show you how and how much the EPA disrespects and abuses the rules and methods of science.

The Submitter's opinions are personal and not attributable to the US Army or Department of Defense.

This submitter has witnessed US EPA misconduct for a period of 3 decades on a scale that is stunning, or alarming, going back to the EPA decision to ban DDT in the early 1970s, resulting in the deaths of millions in the 3rd world, and a particularly horrific impact on children.

More recently in addition to serial misconduct with regards to toxicology and epidemiology research the EPA has compounded its scientific methodology misconduct with a systematic violation of domestic and international ethical and moral/legal norms in regards to human experimentation—promoting and funding, approving human experiments that resulted in uninformed subjects being involved in experiments at 10 domestic and 6 foreign medical research institutions where they were intentionally observed while inhaling small particle contaminated air while being observed for adverse effects. These experiments carried out by prominent Medical Schools, is in spite of US EPA public pronouncements and testimony before congress that small particles are toxic, lethal (Hundreds of thousands of deaths annually) and carcinogenic.

US domestic law prohibits human experiments that might harm and international medical ethical standards for human experiments prohibit human experiments with no exceptions except exigencies of great need if the researchers act as subjects. Any other human experiments with a risk of harm are prohibited, and no consent will remove that proscription.

In the past 3 decades US EPA air quality research has been an abomination, relying on junk toxicology/epidemiology and the precautionary principle. The submitter has actively tried to expose the misconduct.

The proposal by the US EPA, discussed here to force EPA scientific transparency and scientific integrity is salutary and significant in all its elements, and the submitter is grateful for the change from the formerly fraudulent toxicology and epidemiology of the EPA to impose a new form of integrity.

Please consider the materials in the attachment as specified to support the position I take, that the Transparency proposal is a vital and very important policy for the EPA that will have beneficial effects in that it will identify the nature and magnitude of the US EPA research misconduct I put on display in the attachment that has been intentionally and viciously put forward as good science for purely partisan ideological purposes, not the pursuit of science that allows the US EPA to identify real risks and mitigate the effects of those risks.

Cordially and respectfully,
/JDunn MD/
John Dale Dunn MD JD

Personal Matters / Ex. 6